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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 Adrian A. Wolf, an individual,

Case No.: 2:19-cv-2222

11 Plaintiff,

12 vs.  
**Joint Stipulation And Order To**  
**Extend the Deadline to File the Joint**  
**Pre Trial Order**

13 LVGV, LLC dba The M Resort Spa Casino, a  
14 Nevada limited liability company; Does I through V;  
15 and Roe Business Entities VI through X,

(Third Request)

16 Defendants.

17 Plaintiff, ADRIAN A. WOLF, by and through his counsel, LUH & ASSOCIATES, and  
18 Defendant, LVGV, LLC dba THE M RESORT SPA CASINO, by and through its counsel,  
19 WILSON ELSER, do hereby stipulate to the extension of the deadline to file a joint per trial  
20 order, which is currently due on June 18, 2021 per the Court's Order Denying Defendant's Motion  
21 for Summary Judgment regarding Liability [ECF No. 18] and granting in part the Defendant's  
22 Motion for Summary Judgment regarding Damages [ECF No. 19].<sup>1</sup> The parties are in the process  
23 of setting up the deposition of Plaintiff's expert Dr. Randall Yee for either July 21 or July 28,  
24 2021. For this reason, the parties request that the deadline to file the Joint Pre Trial Order is  
25 extended to August 30, 2021.

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<sup>1</sup> Dkt. No. 28.

## **DISCOVERY COMPLETED TO DATE**

- The parties have conducted an FRCP 26(f) conference and have served their respective FRCP 26(a) disclosures.
  - Defendant served requests for production of documents upon Plaintiff.
  - Defendant served interrogatories upon Plaintiff.
  - Plaintiff served interrogatories upon Defendant.
  - Plaintiff responded to the requests for production of documents.
  - Plaintiff responded to the interrogatories.
  - Plaintiff served requests for admission upon Defendant.
  - Defendant responded to the interrogatories.
  - Defendant responded to the requests for admission.
  - Plaintiff designated an expert and produced a report from said expert.
  - Defendant designated an expert and produced a report from said expert.
  - Plaintiff designated a rebuttal expert and produced a report from said expert.
  - Defendant designated a rebuttal expert and produced a report from said expert.
  - Deposition of Plaintiff.
  - Deposition of Plaintiff's wife Virginia Wolf.
  - Deposition of Don Gifford.
  - Deposition of Kevin Prentiss.

## **DISCOVERY TO BE COMPLETED**

Discovery to be completed includes the following:

- Expert deposition of Dr. Randall Yee which will be set for either July 21 or July 28, 2021.

Pursuant to Local Rule 6-1, the parties agree that good cause exists for the proposed extension of the deadline to file a Joint Pre Trial Order due to the upcoming deposition of Plaintiff's expert Dr. Randall Yee in July of 2021. Since the Court's ruling on the Defendant's Motion for Summary Judgment regarding Liability regarding Liability [ECF No. 18] and granting in part the Defendant's Motion for Summary Judgment regarding Damages [ECF No. 19],<sup>2</sup> the parties have

2 Dkt. No. 28.

1 stipulated to the taking of Dr. Randall Yee's deposition and are in the process of setting up Dr.  
2 Yee's deposition.

3 **[PROPOSED] NEW DISCOVERY DEADLINES**

4 <b>Discovery Cut-Off Date</b>	<b>Closed</b>
5 <b>Dispositive Motion Deadline</b>	<b>Closed</b>
6 <b>Proposed Joint-Pre-Trial Order</b>	<b>August 30, 2021</b>

7 DATED this 17<sup>th</sup> day of June, 2021.

DATED this 17<sup>th</sup> day of June, 2021.

8 **WILSON, ELSER, MOSKOWITZ &  
9 DICKER, LLP**

**LUH & ASSOCIATES**

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15 **ORDER**

16 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that this STIPULATION TO  
17 TO EXTEND THE DEADLINE TO FILE THE JOINT PRE TRIAL ORDER is hereby granted,  
18 and that the discovery deadlines will be amended as follows:

21 <b>Discovery Cut-Off Date</b>	<b>Closed</b>
22 <b>Dispositive Motion Deadline</b>	<b>Closed</b>
23 <b>Proposed Joint-Pre-Trial Order</b>	<b>August 30, 2021</b>

25 DATED this 22nd day of June, 2021



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UNITED STATES MAGISTRATE JUDGE